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7 Attorneys for Defendants Bank of America Corporation; Bank of America N.A.;
 8 Banc of America Mortgage Securities, Inc.; and ReconTrust Company, N.A.

9 **IN THE UNITED STATES DISTRICT COURT**
 10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

11
 12 STEVIE BRADFORD, an individual;
 13 JEFFERY WHITE, an individual;
 LETICIA MERCADO, an individual;
 14 REFUGIO MERCADO, an individual;
 GLORIA FERREL, an individual;
 15 ROBERT FERREL, an individual;
 KAREN GILMORE, an individual;
 16 LARRY MOORE, an individual;
 STEPHEN CHILDS, an individual;
 17 FRANCISCO RAMIREZ, an individual;
 MARIA RAMIREZ, an individual;
 18 MARIA PEREZ, an individual;
 WAYNE FONTZ, an individual;
 19 LOURDES FONTZ, an individual;
 JOHN LIPONI, an individual; DUNG
 20 HO, an individual; JOAN TUCKER, an
 individual; HAROLD TUCKER, an
 21 individual; WALTER LUSK, an
 individual; JAMES WILLIAMS, an
 22 individual; HASSAN ABDALLAH, an
 individual; MARIA ABDALLAH, an
 23 individual; LUIS SOTO, an individual;
 ARMINE AKCHEIAN, an individual;
 24 PETER BALATA, an individual;
 AGUSTIN (JOHN) LATOSQUIN, an
 25 individual; CRAIG FREIS, an
 individual; CARLA ORTIZ, an
 26 individual; MANUEL AMAYA, an
 individual; ANA JULIA AMAYA, an
 27 individual; TERRY STRAW, an
 individual; STACY STRAW, an
 28 individual; OSCAR BOBADILLA, an

Case No. 2:15-cv-05201-GHK
 Honorable George H. King

**DEFENDANTS' REQUEST FOR
 JUDICIAL NOTICE IN SUPPORT
 OF DEFENDANTS' OPPOSITION
 TO PLAINTIFFS' MOTION TO
 REMAND**

Date: September 14, 2015
 Time: 9:30 a.m.
 Dept: 650

Action filed: June 11, 2015
 Trial date: None set

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1 individual; JOSE ALVARENGA, an
individual; JOSEPH MOORE, an
2 individual; ADELA MOORE, an
individual; GEORGE LUCAS, an
3 individual; MARIA ODELL, an
individual; ALEJANDRO BASURTO,
4 an individual; CHOR CHUN NGAN, an
individual; CARLOS CASTILLO, an
5 individual; ISABEL ARREOLA, an
individual; AMAR MALHI, an
6 individual; KULWANT KAUR MALHI,
an individual; JULIO SANTA CRUZ, an
7 individual; DANIEL PERAZZO, an
individual; DELJEAN STARKS, an
8 individual; EDWARD GONZALES, an
individual; BERNICE GONZALES, an
9 individual; BARMWOOD COX, an
individual; RUBEN GARCIA, an
10 individual; AMBER KRAUS, an
individual; GREG KRAUS, an
11 individual; RAYMOND LUNA, an
individual; PAUL RUSCONI, an
12 individual; LARRY BLUFORD, an
individual; MICHELLE HARBOUR, an
13 individual; MARY DAVIDSON, an
individual; KERALD MITCHELL, an
14 individual; MERCY UMEOKAFOR, an
individual; MARTIN LOZANO, an
15 individual; DONALD MILLER, an
individual; ALIS NAZIKYAN, an
16 individual; EVA FLOWERS, an
individual; CAL BELL, an individual;
17 JAIME SEVILLA, an individual;
WILMER Y ABAR, an individual;
18 SALVADOR MARTINEZ, an
individual; STEVEN THORNE, an
19 individual; PETE FLORES, an
individual; CYNTHIA FLORES, an
20 individual; REYNALDO JAOJOCO, an
individual; CORAZON JAOJOCO, an
21 individual; PAT HENNEMANN, an
individual; JOHN HENNEMANN, an
22 individual; ROGER GOWRINATHAN,
an individual; CARLOS HURTADO, an
23 individual; NORMA NAVARRO, an
individual; SCOTT STREISEL, an
24 individual; TRACI JOHNSON, an
individual; EMETERIO RODRIGUEZ,
25 an individual; PEDRO PEREZ, an
individual; GRISELDA PEREZ, an
26 individual; HERMILO ROBLES
GOMEZ, an individual; JOAQUIN
27 REYES, an individual; MONICA
GONZALEZ, an individual;
28 MARCELINO ROMAN, an individual;

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1 VICTOR MUNOZ, an individual;
INGRID MUNOZ, an individual;
2 ALFREDO JIMENEZ, an individual;
LARRY RIMER, an individual; TONY
3 KEUSSEYAN, an individual; EILEEN
KEUSSEYAN, an individual; EMMIT
4 COLLIER, an individual; MARIA
CUARA, an individual; ALAN
5 HUNTER, an individual; RUDESINDO
FERNANDEZ, an individual;
6 CORNELIO BOSQUES an individual;
EDDIE EBRAHIMI, an individual;
7 ROXANA MARROQUIN, an
individual; PEDRO MARROQUIN, an
8 individual; ROCIO LOPEZ, an
individual; JUAN DE DIOS
9 LANDAVERDE an individual;
REBECCA ARTMORE, an individual;
10 MICHEAL ARTMORE, an individual;
SHARON WILSON, an individual;
11 STANLEY GRAHAM, an individual;
ISIDRO DUARTE, an individual;
12 JESUS JUAREZ, an individual; LILIA
JUAREZ, an individual; HECTOR
13 RODRIGUEZ, an individual; FRED
LEY, an individual; BETTY LEY, an
14 individual; LORENZO SELVA, an
individual; RITA SELVA, an individual;
15 MICHAEL DAVIDSON, an individual;
KIM DAVIDSON, an individual;
16 RAJAH NALLIAH, an individual;
NOELINE SHANMUGAN, an
17 individual; LINDA PAUL, an
individual; DENNIS ROSS, an
18 individual; TIFFANY WONG, an
individual; LINDA K. HUNEKE, an
19 individual; REFUGIO ALARCON, an
individual; LEONARDO ALARCON,
20 an individual; MARGARITA
CONTRERAS, an individual; GEMMA
21 JIMENA, an individual; GLADYS
BOCANEGRA, an individual; JOSEPH
22 CEDILLO, an individual; KEITH KIM,
an individual; KENT VAAGEN, an
23 individual; ARCEO GALLASTEGUI,
an individual; ISABEL
24 GALLASTEGUI, an individual; JOSE
VELADO, an individual; MARIA
25 VELADO, an individual; HECTOR
NIETO, an individual; BRENT BON, an
26 individual; MATTHEW HOFER, an
individual; ANA LARA, an individual;
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28 ELIA HERNANDEZ, an individual;

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1 ARTURO CALDERON, an individual;
JESUS GONZALEZ, an individual;
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3 CHERYL WELCH, an individual;
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4 DAVID RICKARD, an individual,
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5 RODOLFO CAGAMPAN, an
individual; REFUGIO DIAZ, an
6 individual; ROSARIO DIAZ, an
individual; RUBEN ESPINOZA, an
7 individual; RENE ESPINOZA, an
individual; LYNNE MARIE
8 RASMUSSEN, an individual; RONALD
KOLODZIEJ, an individual;
9 MARJEANNE TENDLER, an
individual; ARTHUR TENDLER, an
10 individual; MICHELE VESPIER, an
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11 individual; LORRAINE JOHNSON, an
individual; MEHRAN ABAZARY, an
12 individual; SOHEILA FERDOWSI, an
individual; JULIE ASPIRAS M.D., an
13 individual; MARIA CIBRIAN, an
individual; ERNIE ANZURES an
14 individual; SHERI TOURTELLOTTE-
JOHNSON, an individual; MANUEL
15 QUIROZ, an individual; SERGIO
FAURRIETA, an individual; GARY
16 BROOKSHIER, an individual; MARIA
GOMEZ, an individual; CHARLES
17 BATTLE, an individual; JON
MARQUEZ, an individual; SHIRLEY
18 MARQUEZ, an individual; LOLITA
MANAOAT, an individual; BENITO
19 GONZALEZ, an individual; CARLOS
LEMUS, an individual; LINDA V. DEL
20 ANGEL, an individual; CHARLIE
HARRIS, an individual; SHELLEY
21 CALDWELL, an individual; DEBRA
DEMAGNUS, an individual;
22 LAWRENCE BELL, an individual;
YOLANDA TUMANENG, an
23 individual; VIRGINIA WESTON, an
individual; FRANCIS FUNIESTAS, an
24 individual; MARISSA FUNIESTAS, an
individual; GUILLERMO FLORES, an
25 individual; KENNETH SKAIFE, an
individual; BALDEV SINGH, an
26 individual; DAVID MANAOAT, an
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FLORENDO, an individual; DELICIA
5 FLORENDO, an individual; TEIRA
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6 GOMEZ, an individual; YOLANDA
SMITH, an individual; LEVITA
7 TAYLOR, an individual; WILLIAM
TAYLOR, an individual; JANET
8 HAGEN, an individual; JAMES
HAGEN, an individual; LOLITA
9 CUNANAN, an individual; JOHNNY
VISTA, an individual; OLGA VISTA,
10 an individual; ANDRES IBARRA, an
individual; ANABELLA IBARRA, an
11 individual; ESTELLA DOMINGUEZ,
an individual; MARIA LAZARO, an
12 individual; JESUS LAZARO, an
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13 individual; THOMAS LUKE, an
individual; DEBORAH LUKE, an
14 individual; JUAN MOYA, an individual;
VERONICA MOYA, an individual;
15 ROBERT RODEN, an individual;
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28 LUNA, an individual; LARRY

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1 BLUFORD, an individual; KERALD
MITCHELL, an individual; MERCY
2 UMEOKAFOR, an individual;
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ANA LARA, an individual; JESUS
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5 individual; LINDA HUBBARD, an
individual; EDUARDO MUNOZ, an
6 individual; EDDIE MUNOZ, an
individual; ROLANDO MARTINEZ, an
7 individual; RONALD RUIZ, an
individual; SANDRA RUIZ, an
8 individual; HOPERT MADISON, an
individual; TERI O'ROURKE, an
9 individual; SANDRA MORAN, an
individual; JUAN MUNOZ, an
10 individual; JAMES WALKER, an
individual; WILLIAM COSTA, an
11 individual; TONY CASTADINI, an
individual; BARBARA HARADA, an
12 individual; BARBARA HENRY, an
individual; PAUL HENRY, an
13 individual; DAWN MAHURIN, an
individual; MARK MORGAN, an
14 individual; RICH JOHNSON, an
individual; MICHELLE JOHNSON, an
15 individual; AURELIO RUIZ, an
individual; YASMINE KABUYA, an
16 individual; GRACE ZARAGOZA, an
individual; CARLOS MAGALLON, an
17 individual; MARIO DIAZ, an
individual; MAGADELENA DIAZ, an
18 individual; CLIFTON KINGSTON, an
individual; TERESA IRANNEJAD, an
19 individual; MICHAEL MCDONALD,
an individual; LUISA VARGAS, an
20 individual; JESSE CHAPMAN, an
individual; SAVIOUR AZZOPARDI, an
21 individual; KATHRYN AZZOPARDI,
an individual; BEATRIZ GARCIA, an
22 individual; GILBERTO SANABRIA, an
individual; ADRIAN AGUILAR, an
23 individual; and JOSE GUTIERREZ, an
individual;

24
25 Plaintiffs,

26 vs.

27 BANK OF AMERICA
28 CORPORATION, a Delaware
corporation; authorized to do business in

1 California; BANK OF AMERICA,
2 N.A.; BANC OF AMERICA
3 MORTGAGE SECURITIES, INC., not
4 authorized to do business in California;
5 RECONTRUST COMPANY, N.A., and
6 DOES 1 through 100, inclusive,
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Defendants.

BRYAN CAVE LLP
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SANTA MONICA, CA 90401-2386

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on September 14, 2015, in Department 650 of the above-entitled Court, located at 255 East Temple Street, Los Angeles, California 90012, Defendants Bank of America Corporation, Bank of America, N.A., Banc of America Mortgage Securities, Inc., and ReconTrust Company, N.A. (collectively, "Defendants") will, and hereby do, request that this Court take judicial notice of the following document:

- Exhibit 1: The Complaint filed in this action in state court before the action was removed to this Court.

This Request for Judicial Notice is based on this Request for Judicial Notice and the accompanying Memorandum of Points and Authorities, the concurrently filed Opposition to Plaintiffs Remand Motion, and all other matters that the Court may consider.

Dated: August 24, 2015

BRYAN CAVE LLP

By: /s/ Nafiz Cekirge
Nafiz Cekirge
Attorneys for Defendants
Bank of America Corporation; Bank of America N.A.; Banc of America Mortgage Securities, Inc.; and ReconTrust Company, N.A.

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 “A court may take judicial notice of a document filed in another court.”
 3 *United States v. Jones*, 29 F.3d 1549, 1553 (9th Cir. 1994) (internal quotations and
 4 citation omitted). The Complaint, attached as Exhibit 1, is a true and correct copy of
 5 the Complaint that Defendants retrieved from the state court docket in this action.
 6 Accordingly, this Court should take judicial notice of Exhibit 1.

7
 8 Dated: August 24, 2015

BRYAN CAVE LLP

9 By: /s/ Nafiz Cekirge

10 Nafiz Cekirge
 11 Attorneys for Defendants
 12 Bank of America Corporation; Bank of
 13 America N.A.; Banc of America Mortgage
 14 Securities, Inc.; and ReconTrust Company,
 15 N.A.
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